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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0095

Comment submitted by R. R. Polachek

Submitter Information

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General Comment

I am an urban cattle farmer and am committed to environmental stewardship. I always do my part to help create a healthy Chesapeake Bay and local waters. With and without funding, I have always implemented and maintained best practices especially regarding water issues. My pasture grass is maintained properly and serves as an excellent filter for stormwater runoff, can be a carbon sink, and captures sediment. I do and will continue to do all of this without federal or state funds - and without being "counted" by EPA. EPA does not need to substitute its version of heavy-handed, government regulation if the state chooses to build off of the incentive-based practices and programs that have resulted in progress over the decades. EPA's "backstop" measures put in the TMDL will certainly result in more costs for permitted facilities, such as large animal feeding operations, processing facilities, and urban landscapes. I question the "reasonable assurance" offered by EPA's backstops, as current regulatory authority and details on new requirements are both unclear. Instead of forcing states to regulate their

way out of “backstops,” I urge EPA to allow Virginia to implement its own plans for achieving clean water goals—without costly, burdensome regulations.